

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

WASHINGTON SHERATON CORPORATION,)
)
Plaintiff,)
)
vs.)
)
2660 WOODLEY ROAD JOINT VENTURE,)
)
and,)
)
JOHN HANCOCK LIFE INSURANCE)
COMPANY (formerly known as John Hancock)
Mutual Life Insurance Company),)
)
Defendants.)

Case No. 1:05CV0971-HHK

DEFENDANT'S CONSENT MOTION FOR AN EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b), defendant John Hancock Life Insurance Company ("defendant"), through undersigned counsel, respectfully requests the Court for an extension of time of 30 days within which to file its motion to dismiss plaintiff's complaint. This is defendant's first request for an extension of time in this Court. On May 17, 2005, plaintiff's counsel, Mr. William Brewer, consented to this motion.

Defendant filed its notice of removal in this case on May 16, 2005. Defendant's answer is currently due on May 23, 2005, within 5 days of the date of filing of the notice of removal. *See* Fed. R. Civ. Proc. 81(c); 6(a). Defendant intends to file a motion to dismiss plaintiff's complaint, in lieu of an answer. This motion raises several complex issues and requires review of voluminous pleadings and documents from a related case, some of which are currently not in possession of counsel. Therefore, defendant

respectfully requests a 30-day extension, through and including June 22, 2005, within which to file its motion to dismiss plaintiff's complaint.

Respectfully Submitted,

/s/ William E. Wallace, III

William E. Wallace, III (DC Bar No. 298000)

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May 18, 2005

Counsel for John Hancock Life Ins. Co.

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2005, I electronically filed and caused to be served by First Class Mail copies of (1) "STIPULATION," (2) "MOTION FOR AN EXTENSION OF TIME," and (3) "PROPOSED ORDER" addressed as follows:

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/s/ William E. Wallace, III
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